



Cancio, Nadal, Rivera & Díaz, P.S.C.
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March 8, 2017

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

Re: FOIA REQUEST

Dear FOI Officer:

Pursuant to the rights and requirements established under the federal Freedom of Information Act (hereinafter "FOIA"), the undersigned, as legal representatives of the Puerto Rico Electric Power Authority hereby requests the following documents and information:

1. All EPA Laboratory Results for fuel oil Samples Collected by the United States Environmental Protection Agency (hereinafter EPA) from the Puerto Rico Electric Power Authority (hereinafter, PREPA) generating units in San Juan, Palo Seco, Aguirre and South Coast (Costa Sur) during the relevant period of time from 2002 to the present as per the agreements reached between EPA and PREPA in the case of United States of America v. Puerto Rico Electric Power Authority, Civil Action No. 93-2527 (CCC) and the 1999 Consent Decree, as amended in 2004.
2. Copy of all relevant documents regarding all inspections conducted and all fuel oil samples collected by the EPA concerning the quality of PREPA's fuel oil at the generating units in San Juan, Palo Seco, Aguirre and South Coast (Costa Sur) during the relevant period of time from 2002 to the present. The information requested should include the laboratory sample identification, the date it was sampled, the person who performed the sample, and the results obtained from such samples.

3. A certification by EPA that PREPA has fully complied with the terms and conditions of the Fuel Quality Program as established by the Consent Decree.
4. The name(s) and contact information of EPA representatives who are most knowledgeable with the fuel oil quality requirements of the Consent Decree between PREPA and the EPA and of PREPA's compliance with the Fuel Quality Program as established in the Consent Decree.
5. Any formal communications between the EPA and PREPA regarding the aforementioned requests.

Please submit the documents in electronic form, preferably as pdf files, via email or CD. If you have any questions regarding this request, please contact us at [787-767-9625; mvazquez@cnrd.com or adiaz@cnrd.com]. We look forward to receiving your response within the statutory time period.

Thank you for your time and attention to this matter.

Very truly yours,

/s/ Arturo Diaz
Arturo Diaz-Angueira

/s/ Maraliz Vázquez-Marrero
Maraliz Vázquez-Marrero